

CadApr20

Date

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Dear Sir/Madam,

Consultation on Urgent Uniform Network Code (UNC) Modifications aimed at mitigating the impacts of COVID-19

We welcome the opportunity to respond to the four Urgent consultations. Our representations have been submitted to the Joint Office of Gas Transporters and will be published on their website shortly.

We are very aware that COVID-19 is presenting a serious challenge for the energy industry as a whole and the communities that we all serve. We are fully committed to continuing to work with Ofgem, government and the wider industry to try to mitigate the impact of these challenges as much as we can. We stand ready to support where we can, but remain unclear about the size of the challenge and where specifically support is needed.

We are supportive of introducing temporary measures to alleviate some of the immediate impacts to the gas market and our customers and we are also committed to ensuring that the potential longer term and wider impacts are also fully considered and mitigated against. To that end, we support three of the urgent modification proposals, specifically Modifications 0722¹, 0723² and 0724³. We cannot, at this time, support the solution outlined within Modification 0721(Urgent)⁴, as we believe that it may result in material unintended consequences for Cadent and other transporters, the industry and customers which, to date, have not been fully considered. Full details of our concerns are set out in our consultation response but we do not believe, at this time, that it has been demonstrated that the solution of Modification 0721 will achieve the objectives that it is designed to meet. Before any proposed implementation of Modification 0721, we believe that further analysis is required in relation to its impact and also further consideration of alternative options.

We look forward to discussing this further with you and the rest of the industry and to continuing to work together to find the best way forward in these unprecedented times.

Yours sincerely

By email

Gurvinder Dosanjh

Industry Codes Manager

¹ Allow Users to submit Estimated Meter Reading during COVID-19.

² Use of the Isolation Flag to identify sites with abnormal reduction during COVID-19 period.

³ Amendment to Ratchet charges during COVID-19 period.

⁴ Shipper submitted AQ corrections during COVID-19.